

PART 2 OF EXHIBIT 2

**IN THE UNITED STATES COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

In re. Uber Technologies, INC., Passenger
Sexual Assault Litigation

Case No.
3:23-md-03084-CRB

**Updated Expert Report of Lacey R. Keller ("Updated Keller Report")
Appendix D - Driver Profiles**

Dated: December 2, 2025

Confidential and Subject to Protective Order

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I. Overview

1. I provide a summary of the Bellwether trips and Drivers in Table 1. Uber collected information on trips, Driver ratings, communications and push notifications, and SA/SM Incidents.
2. The tables and figures in each profile demonstrate the visibility that Uber had into patterns and trends in each Driver's activity, such as the day of the week/time of day that a Driver most frequently drove, including the percentage of a Driver's trips that occurred during weekends and late-night hours, which are time periods identified by Uber as potentially correlated with higher rates of SA/SM Incidents.¹
3. I analyzed Driver rating (e.g., 1 to 5 Stars)² and the details of their Safety Incident History, including all reported SA/SM Incidents³ – features which have been identified by Uber as potential "precursors"⁴ of SA/SM Incidents. I was also requested by counsel to review "idle ride push notifications"⁵ for each Driver.
 - 3.1. I conducted an analysis of Driver rating by time of day and day of the week. Uber has stated that, for a male Driver, "trends show he gets rated considerably lower (4* or below) by female riders on late night pickups from entertainment districts, on Friday and Saturday nights."⁶ While Rider gender and trip location details for trips other than the Plaintiffs' were not included in the produced data, I examined whether any patterns emerged in which a Driver received lower ratings during specific periods, such as late night hours on weekends.
 - 3.2. I also reviewed idle ride push notifications received on Driver's trips, analyzing them by time of day and day of the week. I ran the same analysis on all Driver's communication logs with Uber, but not all Drivers in these examples received idle ride notifications. For those Driver profiles, I have included the blank table indicating no idle ride notifications were found in the data.
 - 3.3. Finally, I reviewed the details of each Driver's reported SA/SM Incidents, including the Plaintiff's trip.

¹ UBER_JCCP_MDL_003504225; UBER_JCCP_MDL_000356814; UBER_JCCP_MDL_001755017; UBER_JCCP_MDL_000031720; Deposition of Sunny Wong, 10/14/2025.

² UBER_JCCP_MDL_003306684.

³ UBER_JCCP_MDL_000031720; UBER_JCCP_MDL_000964270.

⁴ UBER_JCCP_MDL_000356814.

⁵ Counsel requested the following phrases to be analyzed: "Your ride's been stopped for a while. Please let us know if everything is OK.", "Your ride's been stopped for a while. Is everything okay?", "Your ride's been stopped for a while. Please let us know if everything is OK.", "Your ride's been stopped for a while. Is everything okay?", "Se detuvo el viaje por un momento. Infórmanos si todo está bien."

⁶ UBER_JCCP_MDL_000541459.

4. For each Driver, I include a timeline that consolidates all structured data produced in this matter into a single chronological record, which is provided in Appendix D1. Where the data was available, the timeline shows all structured data events captured and produced by Uber, including trips, communications, raw data from the SA/SM Incident Data reports, S-RAD scores, onboarding records, and other events. I also include the Flack SA/SM Incident data for each Driver in Appendix D2.
5. The following table summarizes the key information for each Bellwether Driver profile.

Table 1: Summary of Bellwether Driver Profiles

| Plaintiff | Dean | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
|--|----------------------------|-------------------------|---------------------------|----------------------------|----------------------------|
| Driver | Turay | Orozco | Richardson | Rodriguez | Le |
| City | Tempe, AZ | San Francisco, CA | Garner, NC | Phoenix, AZ | San Francisco, CA |
| Date of Incident | 11/15/2023 ⁷ | 08/12/2022 ⁸ | 03/25/2019 ⁹ | 06/28/2024 ¹⁰ | 8/10/2023 ¹¹ |
| Driver Total Trips per Uber's Investigations Workbench | 11,117 trips ¹² | 669 trips ¹³ | 1,533 trips ¹⁴ | 26,149 trips ¹⁵ | 11,413 trips ¹⁶ |

⁷ UBER-MDL3084-DFS00003727.⁸ UBER-MDL3084-DFS00061375.⁹ UBER-MDL3084-BW-00048509; UBER-MDL3084-DFS00074490.¹⁰ UBER-MDL3084-DFS00049324.¹¹ UBER-MDL3084-DFS00160114.¹² UBER-MDL3084-BW-00006333.¹³ UBER-MDL3084-BW-00006405.¹⁴ UBER-MDL3084-BW-00006374.¹⁵ UBER-MDL3084-BW-00006422.¹⁶ UBER-MDL3084-BW-00006398.

| Plaintiff | Dean | Lebaron | Mensing | Minfield | Roberts |
|--|---|-------------------------|---------------------------|----------------------------|--|
| Driver Total Trips produced by Uber with local timestamp ¹⁷ | 9,769 trips ¹⁸ | 583 trips ¹⁹ | 1,057 trips ²⁰ | 23,305 trips ²¹ | 4,175 trips ²² |
| # Previous Incidents, Prior to Plaintiff Report | 2 reports (1 marked invalid ²³) | 0 reports ²⁴ | 0 reports ²⁵ | 1 report ²⁶ | 1 report (marked insufficient information by Uber) ²⁷ |
| Driver total 1-star ratings | 62 ²⁸ | 0 ²⁹ | 6 ³⁰ | 160 ³¹ | 12 ³² |
| Driver total 2-star ratings | 12 ³³ | 2 ³⁴ | 0 ³⁵ | 60 ³⁶ | 2 ³⁷ |

¹⁷ Derived using 'Begin Trip At Local' field.

¹⁸ UBER-MDL3084-BW-00006259.

¹⁹ UBER-MDL3084-BW-00006254.

²⁰ UBER-MDL3084-BW-00006262.

²¹ UBER-MDL3084-BW-00006257.

²² UBER-MDL3084-BW-00006265.

²³ UBER-MDL3084-DFS00159600.

²⁴ UBER-MDL3084-DFS00159627.

²⁵ UBER-MDL3084-DFS00159617.

²⁶ UBER-MDL3084-DFS00159622.

²⁷ UBER-MDL3084-DFS00159626.

²⁸ UBER-MDL3084-BW-00006259.

²⁹ UBER-MDL3084-BW-00006254.

³⁰ UBER-MDL3084-BW-00006262.

³¹ UBER-MDL3084-BW-00006257.

³² UBER-MDL3084-BW-00006265.

³³ UBER-MDL3084-BW-00006259.

³⁴ UBER-MDL3084-BW-00006254.

³⁵ UBER-MDL3084-BW-00006262.

³⁶ UBER-MDL3084-BW-00006257.

³⁷ UBER-MDL3084-BW-00006265.

| Plaintiff | Dean | | | | |
|--------------------------------|---------------------|-------------------|-----------------------|----------------------|---------------------|
| Driver total 5-star ratings | 5,189 ³⁸ | 327 ³⁹ | 668 ⁴⁰ | 11,247 ⁴¹ | 2,100 ⁴² |
| Late Night ⁴³ Trip | Yes ⁴⁴ | Yes ⁴⁵ | Yes ⁴⁶ | No ⁴⁷ | Yes ⁴⁸ |
| Weekend ⁴⁹ Trip | No ⁵⁰ | Yes ⁵¹ | No ⁵² | Yes ⁵³ | No ⁵⁴ |
| Pickup within 50 meters of bar | Yes ⁵⁵ | No ⁵⁶ | Unknown ⁵⁷ | No ⁵⁸ | Yes ⁵⁹ |

³⁸ UBER-MDL3084-BW-00006259.³⁹ UBER-MDL3084-BW-00006254.⁴⁰ UBER-MDL3084-BW-00006262.⁴¹ UBER-MDL3084-BW-00006257.⁴² UBER-MDL3084-BW-00006265.⁴³ "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15)⁴⁴ UBER-MDL3084-BW-00006299.⁴⁵ UBER-MDL3084-DFS00160140.⁴⁶ UBER-MDL3084-BW-00048509; UBER-MDL3084-BW-00006278.⁴⁷ The ride started at 10:23PM (UBER-MDL3084-BW-00048904).⁴⁸ UBER-MDL3084-BW-00006305.⁴⁹ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).⁵⁰ UBER-MDL3084-BW-00006330.⁵¹ UBER-MDL3084-DFS00160140.⁵² UBER-MDL3084-BW-00006278; UBER-MDL3084-BW-00048509.⁵³ UBER-MDL3084-BW-00028017.⁵⁴ UBER-MDL3084-BW-00028155.⁵⁵ UBER-MDL3084-BW-00027901; UBER-MDL3084-BW-00048903.⁵⁶ UBER-MDL3084-BW-00048906.⁵⁷ [REDACTED] ride occurred prior to implementation of SRAD (Deposition of Sunny Wong, 07/23/2025, 111:19-22).⁵⁸ UBER-MDL3084-BW-00048904.⁵⁹ Deposition of Sunny Wong, 7/23/2025, 177:8-178:4; UBER-MDL3038-BW-00048905

| | | | | | |
|---|-------------------|-------------------|-------------------|-------------------|-------------------|
| Plaintiff | Dean | | | | |
| S-RAD Score ⁶⁰ | | | | | |
| Driver / Rider Gender Different | Yes ⁶⁶ | Yes ⁶⁷ | Yes ⁶⁸ | Yes ⁶⁹ | Yes ⁷⁰ |
| Early Drop Off (or premature end of ride) | Yes ⁷¹ | Yes ⁷² | N/A ⁷³ | No ⁷⁴ | Yes ⁷⁵ |
| Uber contacts rider or driver during trip (Ridecheck) | Yes ⁷⁶ | Yes ⁷⁷ | N/A ⁷⁸ | No ⁷⁹ | Yes ⁸⁰ |

⁶⁰ I rounded the S-RAD score to two decimal points.

⁶¹ UBER-MDL3084-BW-00048903.

⁶² UBER-MDL3084-BW-00048906.

⁶³ Deposition of Sunny Wong, 07/23/2025, 111:19-22.

⁶⁴ UBER-MDL3084-BW-00048904.

⁶⁵ UBER-MDL3084-BW-00048905.

⁶⁶ UBER-MDL3084-BW-00050318 (JIRA ticket - rider gender F - inferred from she/her self-references); JDean-TempePD-000003 (police report identifies her as female); UBER-MDL3084-BW-00027871 (driver gender M).

⁶⁷ B.L. - Campbell Police Dept. - 000079.

⁶⁸ August 26, 2025 Deposition of Greg Brown, 352:1-10 (rider gender F); UBER-MDL3084-BW-00048503 (driver gender M).

⁶⁹ August 25, 2025 Deposition of Greg Brown, 169:15-170:3 (rider gender F); UBER-MDL3084-BW-00028008 (driver gender M).

⁷⁰ July 16, 2025 Deposition of Greg Brown, 357:15-23 (rider gender F); UBER-MDL3084-BW-00028046 (driver gender M).

⁷¹ UBER-MDL3084-BW-00048883; UBER-MDL3084-BW-00000017.

⁷² UBER-MDL3084-BW-00048899.

⁷³ [REDACTED] ride occurred in March of 2019, which is before RideCheck was released across the US - <https://www.uber.com/newsroom/ridecheck/> (September 17, 2019).

⁷⁴ UBER-MDL3084-BW-00049299; UBER-MDL3084-BW-00048895.

⁷⁵ UBER-MDL3084-BW-00048898.

⁷⁶ UBER-MDL3084-BW-00000017; BW-DEAN_JAYLYNN_000083 –000085.

⁷⁷ UBER-MDL3084-BW-00000023.

⁷⁸ [REDACTED] ride occurred in March of 2019, which is before RideCheck was released across the US - <https://www.uber.com/newsroom/ridecheck/> (September 17, 2019).

⁷⁹ UBER-MDL3084-BW-00049299; UBER-MDL3084-BW-00048895.

⁸⁰ UBER-MDL3084-BW-00000012.

| | | | | | |
|----------------------------------|-------------------|----------------------|----------------------|-------------------|-------------------|
| Plaintiff | Dean | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| Corrective Action (deactivation) | Yes ⁸¹ | Yes ^{82,83} | Yes ^{84,85} | Yes ⁸⁶ | Yes ⁸⁷ |

⁸¹ UBER-MDL3084-DFS00003727.

⁸² UBER-MDL3084-DFS00160141.

⁸³ Orozco continued to operate on Uber's platform in Colombia through July 11, 2025 (UBER-MDL3804-BW-000049303).

⁸⁴ UBER-MDL3084-BW-00007750; UBER-MDL3084-BW-00007775.

⁸⁵ Richardson was wait listed from 2/7/2023, the date Plaintiff [REDACTED] incident was reported, to the date of deactivation (#627124.1, Deposition of Hannah Nilles, 8/07/2025, Exhibit 1868).

⁸⁶ UBER-MDL3084-DFS00049324.

⁸⁷ UBER-MDL3084-DFS00160114; UBER-MDL3084-DFS00159626.

II. Profile: Hassan Turay

6. Hassan Turay was the driver of Plaintiff Dean's trip on November 15, 2023. Turay's Uber Investigations Workbench showed that he had a lifetime total of 11,117 trips. Of the trips Uber produced, a number were missing a local timestamp.⁸⁸ Therefore, I was able to analyze 9,769 trips⁸⁹ with Turay as Driver. Uber tracked when Turay was reported for Safety Incidents, including SA/SM Incidents. Turay had ten reported Safety Incidents, including three SA/SM Incidents: March 24, 2019 (Sexual Misconduct - Comments about Appearance), April 17, 2023 (Sexual Assault - Non-Consensual Kissing, classified "invalid" by Uber), and November 15, 2023 (Sexual Assault - Non-Consensual Penetration). According to Uber's own taxonomy, these incidents escalated in severity over time, with the final incident resulting in Turay's permanent deactivation as an Uber Driver. The supporting Safety Data and related case materials I considered for these SA/SM Incidents are included in the attached Appendices D1 and D2.

⁸⁸'Begin Trip At Local' field.

⁸⁹I analyzed all trip data produced by Uber for the Bellwether Drivers, without limiting the data to dates prior to the Plaintiff's reported incident.

A. Driver Trip Profile

7. The following figure shows Turay's profile on Uber's internal Investigations Workbench.

**Figure 1: Uber's Investigations Workbench Provides an Overview of Turay's Activity, Including Whether He Has Been Banned or Rejected as Rider or Driver
(UBER-MDL3084-BW-00006333)**

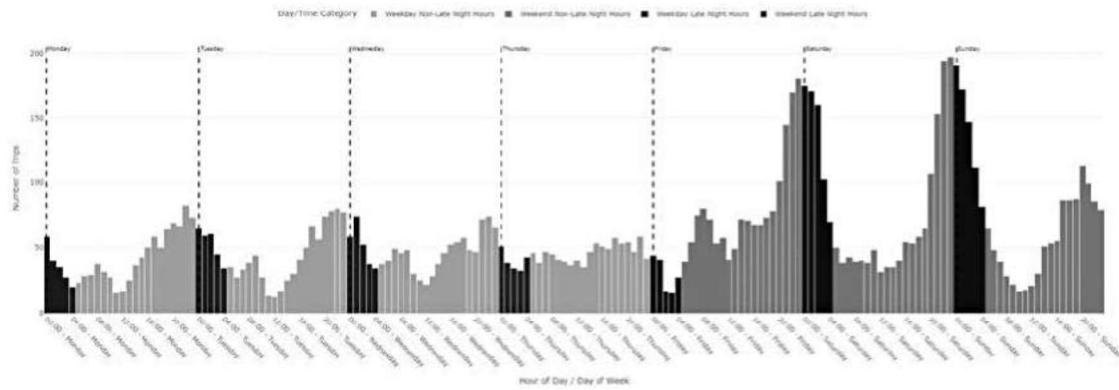


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UBER-MDL3084-BW-00006333

8. The following figure illustrates the total trips driven by day of the week and time of day. This data only considers trips where Begin Trip At Local is known and Status is "completed". The day of the week is determined by the Begin Trip At Local timestamp. "Late night" is defined as 12 AM-4:59 AM.⁹⁰ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.⁹¹

**Figure 2: Turay's Trips During Late-Night or Non-Late-Night Hours on Weekends and Weekdays
(UBER-MDL3084-BW-00006259)**

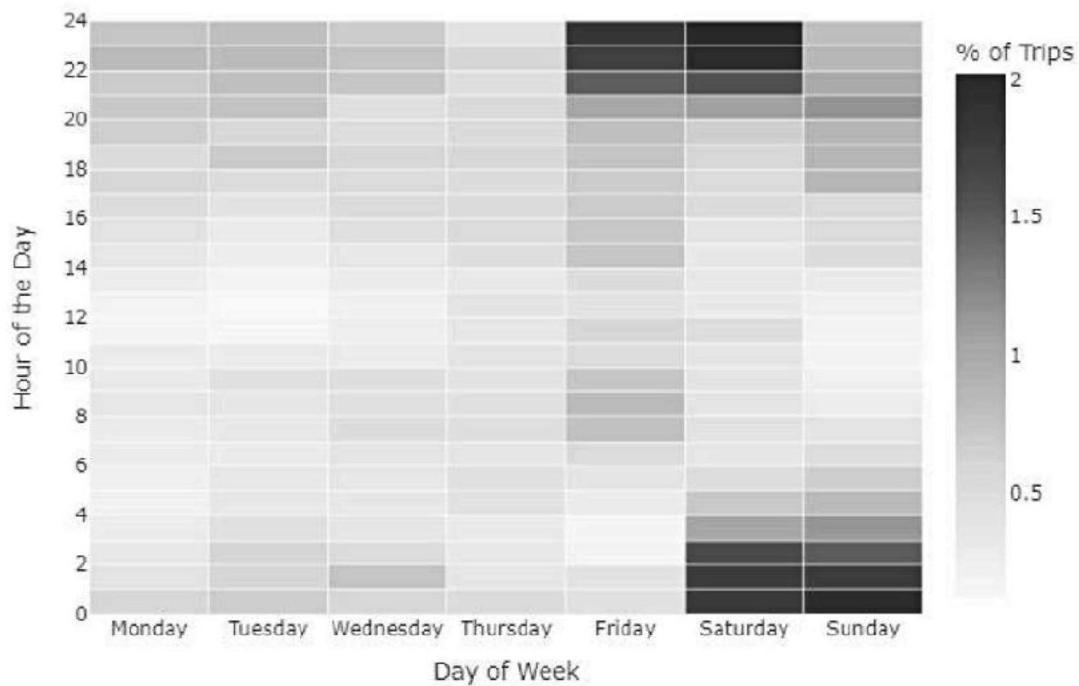


⁹⁰ "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

⁹¹ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

9. The following figure displays a visualization known as a “heat map” of the trip volume. This data only considers trips where “Begin Trip At Local” is known and the “Status” field is shown as “completed.”

**Figure 3: Percent of Turay's Trips by Hour
(UBER-MDL3084-BW-00006259)**



B. Driver Ratings

10. The following table shows the number of completed trips for Driver Turay with a 1, 2, 3, 4, and 5 star rating and the percent of each rating by time of day. Only trips with a known begin date and a submitted rating were considered. "Late night" is defined as 12 AM-4:59 AM.⁹² "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.⁹³

**Table 2: Turay's Ratings (1 to 5 Stars) and When They Occurred
(UBER-MDL3084-BW-00006259)**

| Driver Rating | % Of Trips On Weekday Non-Late Night Hours | % Of Trips On Weekday Late Night Hours | % Of Trips On Weekend Non-Late Night Hours | % Of Trips On Weekend Late Night Hours | Total Rated Trips |
|---------------|--|--|--|--|-------------------|
| 1 | 29.03 | 8.06 | 46.77 | 16.13 | 62 |
| 2 | 58.33 | 0 | 33.33 | 8.33 | 12 |
| 3 | 37.84 | 13.51 | 35.14 | 13.51 | 37 |
| 4 | 53.33 | 1.33 | 28 | 17.33 | 75 |
| 5 | 35.38 | 9.06 | 39.91 | 15.65 | 5,189 |

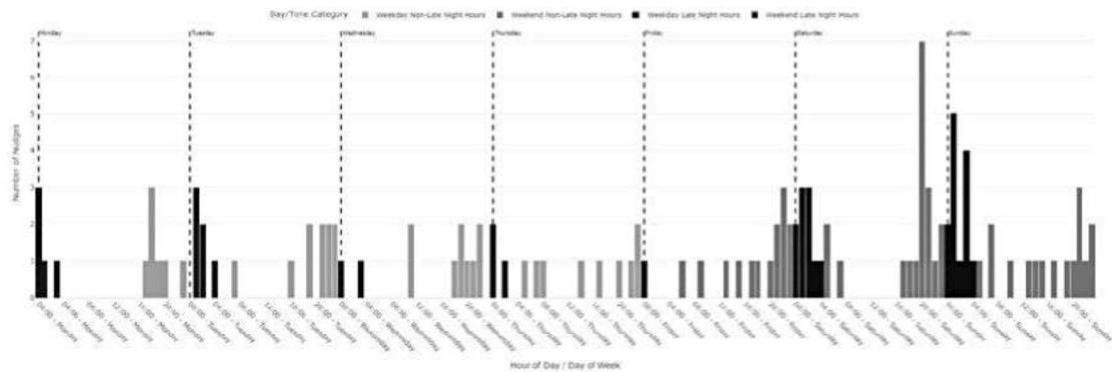
⁹² "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

⁹³ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

C. Idle Ride Notifications

11. In the following figure, I show the volume of Idle Ride Notifications by time of day. Timezones were all converted to U.S./Phoenix. “Late night” is defined as 12 AM-4:59 AM.⁹⁴ “Weekend” is defined as Friday at 12:00 am to Sunday at 11:59pm.⁹⁵

**Figure 4: Analysis of When Uber Sent Turay Idle Ride Notifications
(EX 1605 Mariana Esteves 071525; UBER-MDL3084-BW-00000015)**



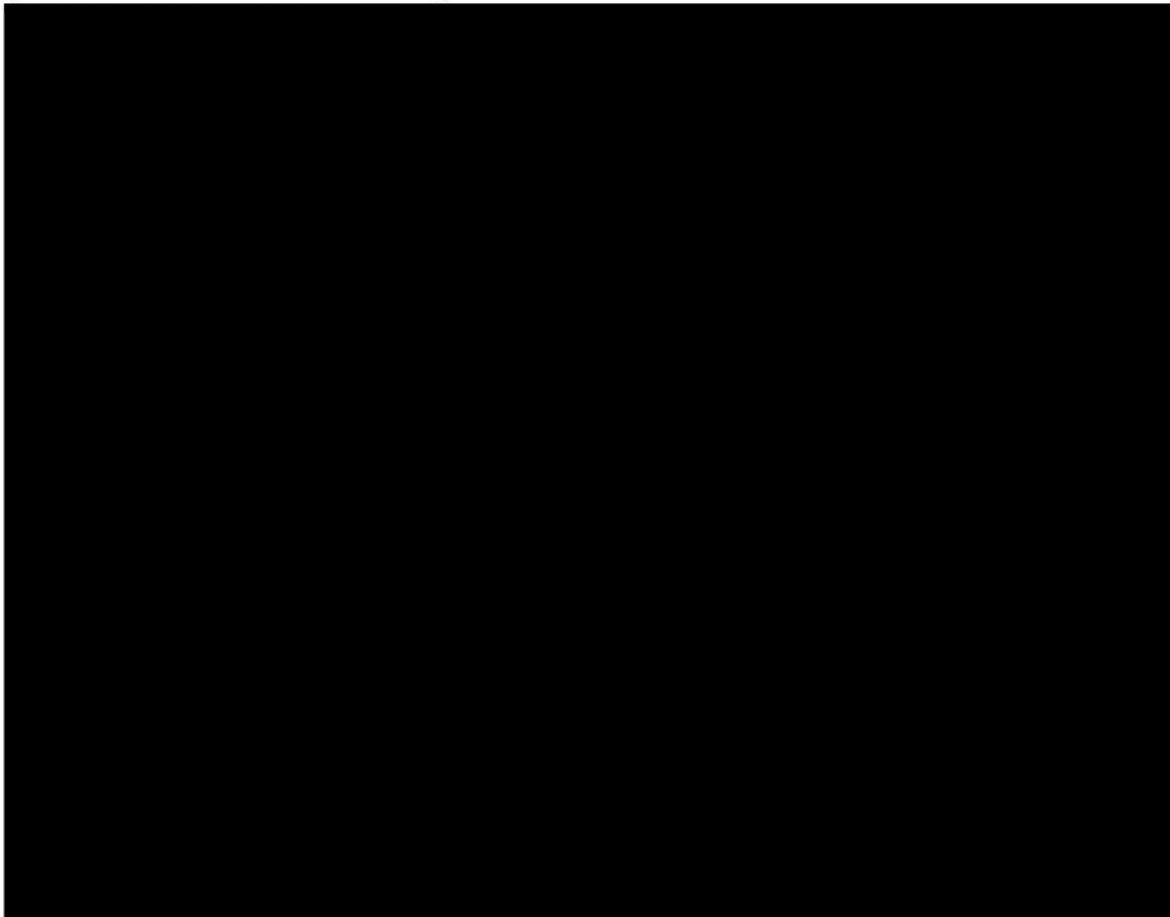
⁹⁴ “Late night” is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

⁹⁵ “Weekend” is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

D. Sexual Assault and Sexual Misconduct Incident History

12. The figure below shows Uber's internal Incident History for Turay.

**Figure 5: Uber Kept Track of Turay's Safety Incident History, Including Sexual Assault and Sexual Misconduct Incidents
(UBER-MDL3084-DFS00159600)**



III. Profile: Edwin Castaneda Orozco

13. Edwin Castaneda Orozco was the driver of Plaintiff [REDACTED] trip on August 12, 2022. Orozco's Uber Investigations Workbench showed that he had a lifetime total of 669 trips. Of the trips Uber produced, a number were missing a local timestamp.⁹⁶ Therefore, I was able to analyze 583 trips⁹⁷ with Orozco as the Driver. Uber tracked when Orozco was reported for Safety Incidents, including SA/SM Incidents. Orozco had only one reported Safety Incident - Plaintiff Lebaron's SA/SM Incident on August 12, 2022 (Sexual Assault Non-Consensual Sexual Penetration). The supporting Safety Data and related case materials I considered for these SA/SM Incidents are included in the attached Appendices D1 and D2.

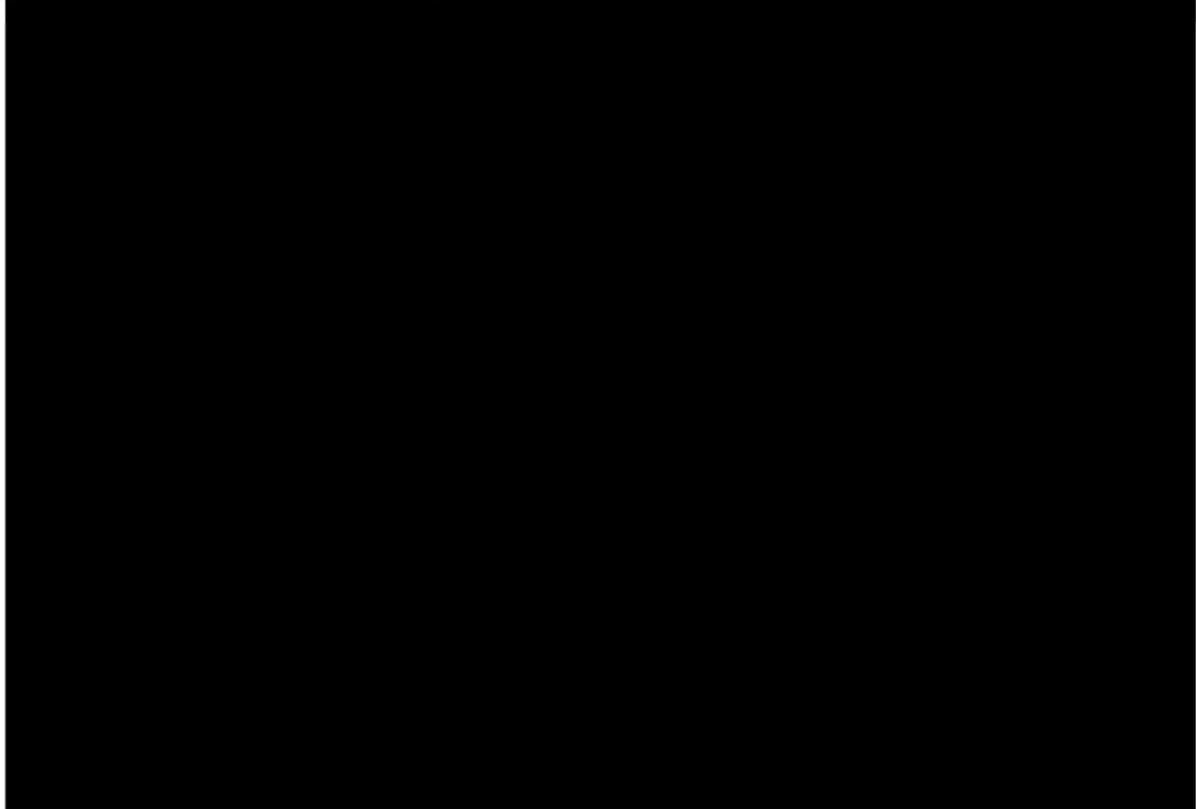
⁹⁶‘Begin Trip At Local’ field.

⁹⁷ I analyzed all trip data produced by Uber for the Bellwether Drivers, without limiting the data to dates prior to the Plaintiff's reported incident.

A. Driver Trip Profile

14. The following figure shows Orozco's profile on Uber's internal Investigations Workbench.

**Figure 6: Uber's Investigations Workbench Provides an Overview of Orozco's Activity, Including Whether He Has Been Banned or Rejected as Rider or Driver
(UBER-MDL3084-BW-00006405)**

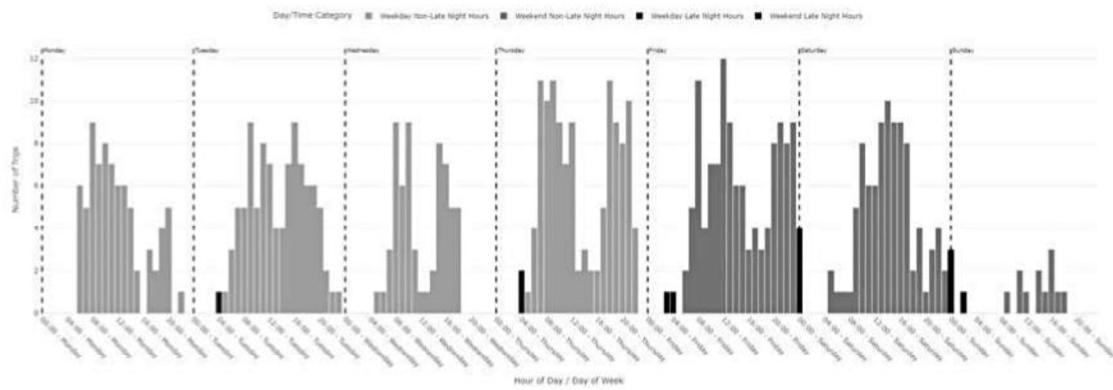


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UBER-MDL3084-BW-00006405

15. The following figure illustrates the total trips driven by day of the week and time of day. This data only considers trips where Begin Trip At Local is known and Status is "completed". The day of the week is determined by the Begin Trip At Local timestamp. "Late night" is defined as 12 AM-4:59 AM.⁹⁸ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.⁹⁹

**Figure 7: Orozco's Trips During Late-Night or Non-Late-Night Hours on Weekends and Weekdays
(UBER-MDL3084-BW-00006254)**

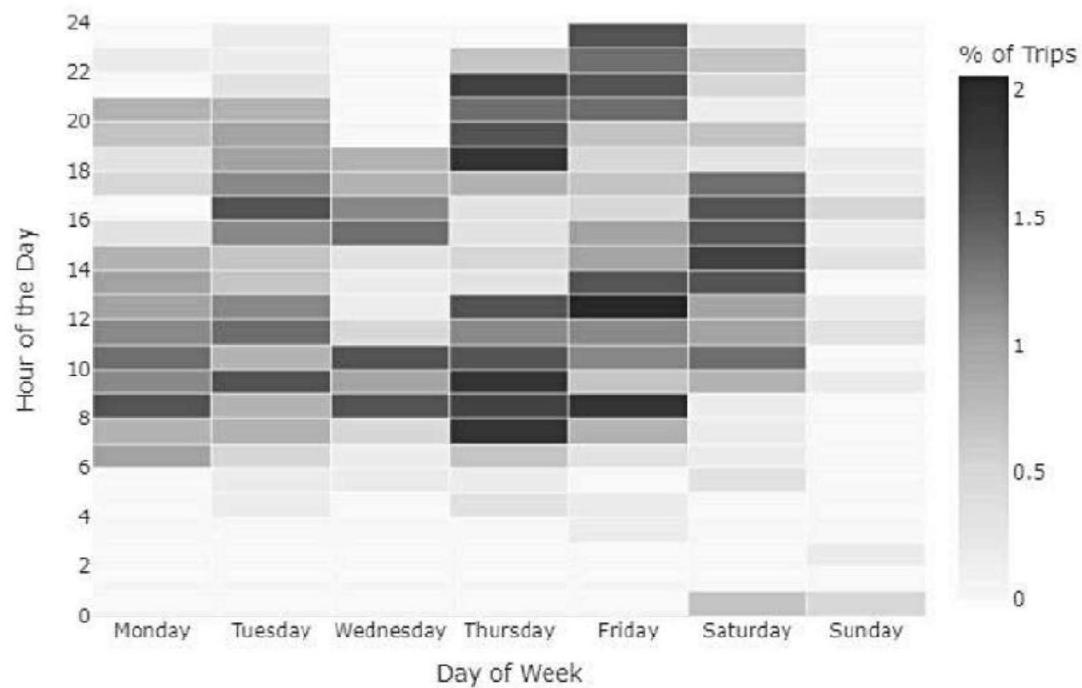


⁹⁸ "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

⁹⁹ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

16. The following figure displays a visualization known as a “heat map” of the trip volume. This data only considers trips where “Begin Trip At Local” is known and the “Status” field is shown as “completed.”

**Figure 8: Percent of Orozco’s Trips by Hour
(UBER-MDL3084-BW-00006254)**



B. Driver Ratings

17. This table shows the number of completed trips for driver Orozco with a 1, 2, 3, 4, and 5 star rating and the percent of each rating by time of day. Only trips with a known begin date and a submitted rating were considered. "Late night" is defined as 12 AM-4:59 AM.¹⁰⁰ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.¹⁰¹

**Table 3: Orozco's Ratings (1 to 5 Stars) and When They Occurred
(UBER-MDL3084-BW-00006254)**

| Driver Rating | % Of Trips On Weekday Non-Late Night Hours | % Of Trips On Weekday Late Night Hours | % Of Trips On Weekend Non-Late Night Hours | % Of Trips On Weekend Late Night Hours | Total Rated Trips |
|---------------|--|--|--|--|-------------------|
| 2 | 50 | 0 | 50 | 0 | 2 |
| 3 | 100 | 0 | 0 | 0 | 2 |
| 4 | 100 | 0 | 0 | 0 | 1 |
| 5 | 61.47 | 0.61 | 36.09 | 1.83 | 327 |

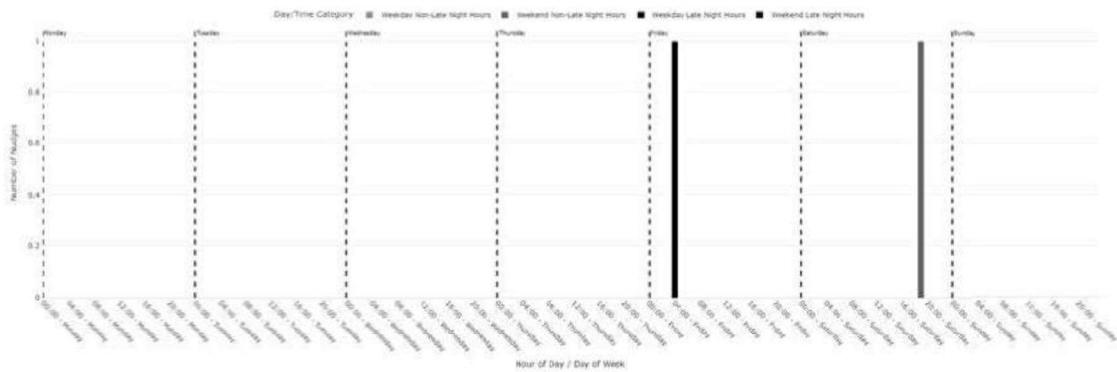
¹⁰⁰ "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹⁰¹ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

C. Idle Ride Notifications

18. In the following figure, I show the volume of Idle Ride Notifications by time of day. Timezones were all converted to U.S./Los_Angeles. “Late night” is defined as 12 AM-4:59 AM.¹⁰² “Weekend” is defined as Friday at 12:00 am to Sunday at 11:59pm.¹⁰³

Figure 9: Analysis of When Uber Sent Orozco Idle Ride Notifications (UBER-MDL3084-BW-00000022)



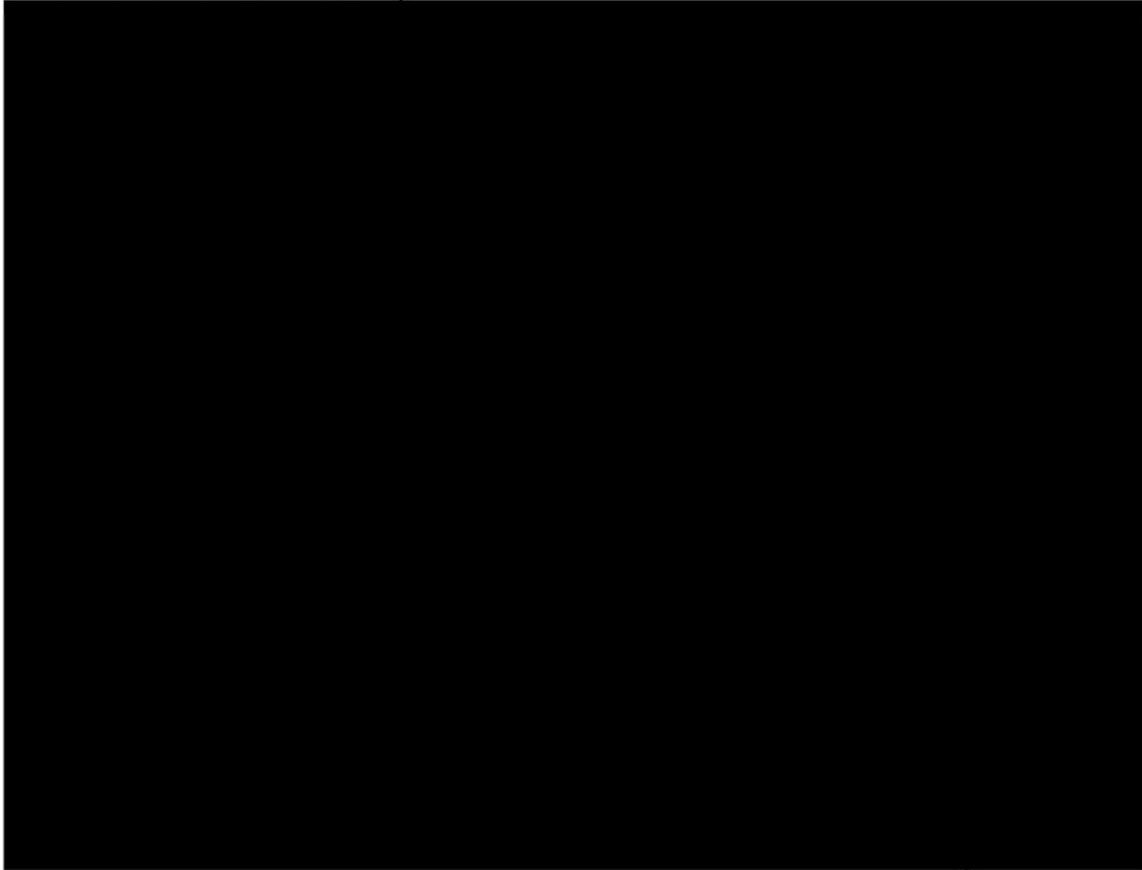
¹⁰² “Late night” is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹⁰³ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

D. Sexual Assault and Sexual Misconduct Incident History

19. The following figure shows Uber's internal Incident History for Orozco.

**Figure 10: Uber Kept Track of Orozco's Safety Incident History, Including Sexual Assault and Sexual Misconduct Incidents
(UBER-MDL3084-DFS00159627)**



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UBER-MDL3084-DFS00159627

IV. Profile: Jeffery Richardson

20. Jeffery Richardson was the driver of Plaintiff [REDACTED] trip on March 25, 2019. Richardson's Uber Investigations Workbench showed that he had a lifetime total of 1,533 trips. Of the trips Uber produced, a number were missing a local timestamp.¹⁰⁴ Therefore, I was able to analyze 1,057 trips¹⁰⁵ with Richardson as the Driver. Uber tracked when Richardson was reported for Safety Incidents, including SA/SM Incidents. Richardson had only one reported Safety Incident - Plaintiff [REDACTED] SA/SM Incident on March 25, 2019 (Sexual Assault Non-Consensual Touching Non-Sexual Body Part). This incident was reported to Uber on February 7, 2023, and Richardson was subsequently "waitlisted with a temporary safety lock."¹⁰⁶ Richardson's Driver Profile was deactivated on January 28, 2025.¹⁰⁷ The supporting Safety Data and related case materials I considered for these SA/SM Incidents are included in the attached Appendices D1 and D2.

¹⁰⁴'Begin Trip At Local' field.

¹⁰⁵ I analyzed all trip data produced by Uber for the Bellwether Drivers, without limiting the data to dates prior to the Plaintiff's reported incident.

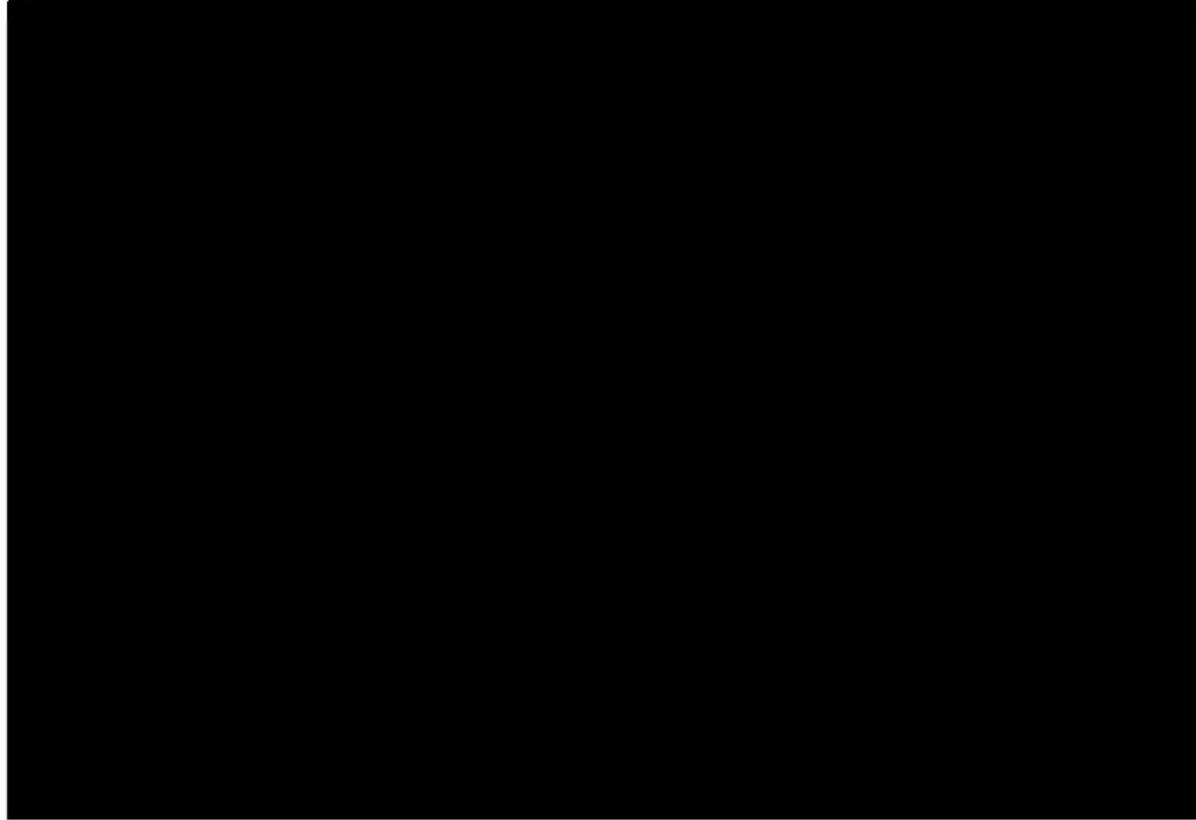
¹⁰⁶ UBER-MDL3084-DFS00074490.

¹⁰⁷ Deposition of Hannah Nilles, 08/07/2025, Exhibit 1868.

A. Driver Trip Profile

21. The following figure shows Richardson's profile on Uber's internal Investigations Workbench.

**Figure 11: Uber's Investigations Workbench Provides an Overview of Richardson's Activity, Including Whether He Has Been Banned or Rejected as Rider or Driver
(UBER-MDL3084-BW-00006374)**

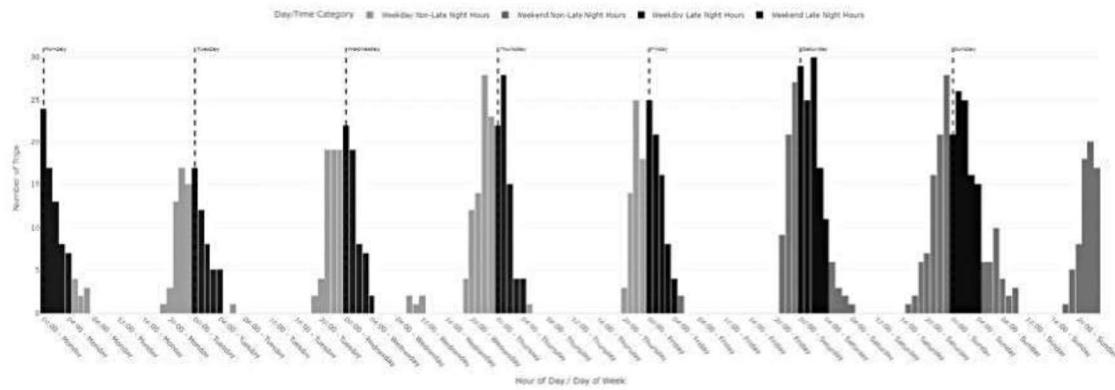


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UBER-MDL3084-BW-00006374

22. The following figure illustrates the total trips driven by Richardson by day of the week and time of day. This data only considers trips where Begin Trip At Local is known and Status is "completed". The day of the week is determined by the Begin Trip At Local timestamp. "Late night" is defined as 12 AM-4:59 AM.¹⁰⁸ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.¹⁰⁹

Figure 12: Richardson's Trips During Late-Night or Non-Late-Night Hours on Weekends and Weekdays (UBER-MDL3084-BW-00006262)

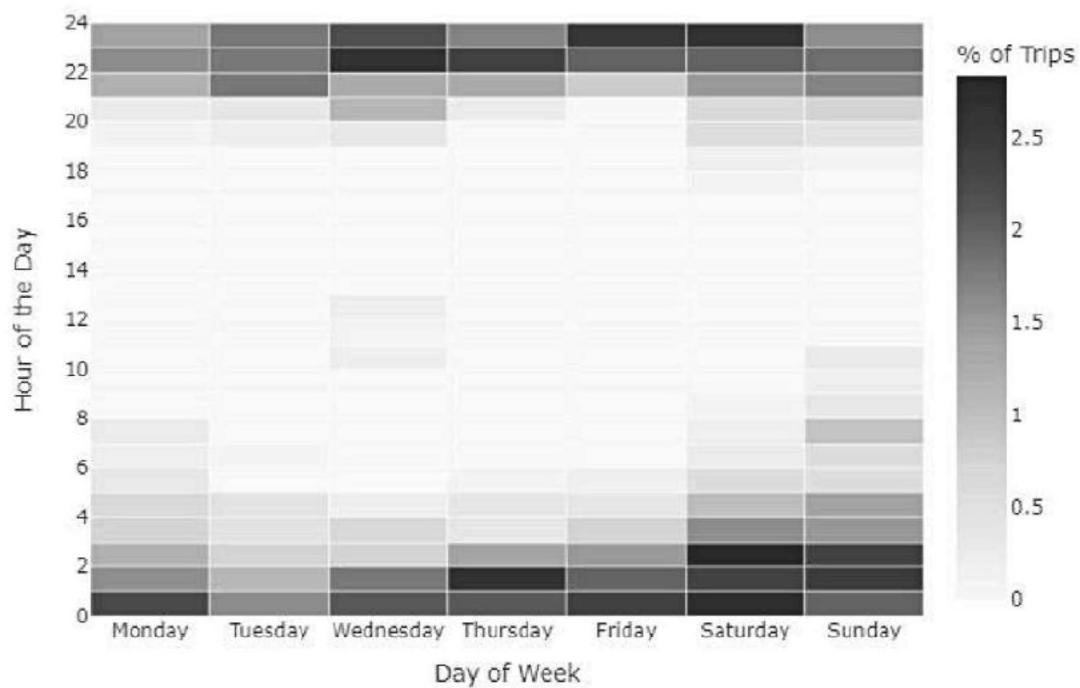


¹⁰⁸ "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹⁰⁹ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

23. The following figure displays a visualization known as a “heat map” of the trip volume. This data only considers trips where “Begin Trip At Local” is known and the “Status” field is shown as “completed.”

**Figure 13: Percent of Richardson's Trips by Hour
(UBER-MDL3084-BW-00006262)**



B. Driver Ratings

24. The following table shows the number of completed trips for driver Richardson with a 1, 2, 3, 4, and 5 star rating and the percent of each rating by time of day. Only trips with a known begin date and a submitted rating were considered. “Late night” is defined as 12 AM-4:59 AM.¹¹⁰ “Weekend” is defined as Friday at 12:00 am to Sunday at 11:59pm.¹¹¹

**Table 4: Richardson’s Ratings (1 to 5 Stars) and When They Occurred
(UBER-MDL3084-BW-00006262)**

| Driver Rating | % Of Trips On Weekday Non-Late Night Hours | % Of Trips On Weekday Late Night Hours | % Of Trips On Weekend Non-Late Night Hours | % Of Trips On Weekend Late Night Hours | Total Rated Trips |
|---------------|--|--|--|--|-------------------|
| 1 | 33.33 | 33.33 | 16.67 | 16.67 | 6 |
| 3 | 0 | 25 | 50 | 25 | 4 |
| 4 | 43.75 | 37.5 | 0 | 18.75 | 16 |
| 5 | 26.35 | 22.9 | 23.35 | 27.4 | 668 |

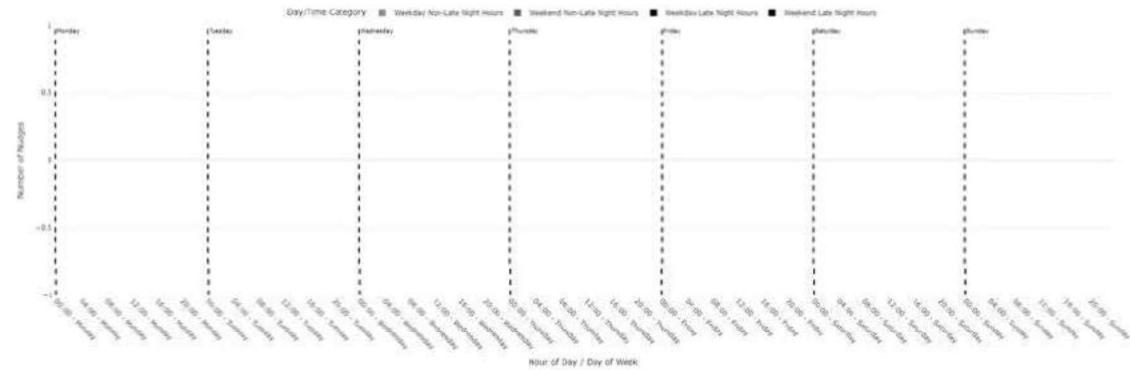
¹¹⁰ “Late night” is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹¹¹ “Weekend” is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

C. Idle Ride Notifications

25. In the following figure, I show the volume of was directed by counsel to consider Idle Ride Notifications by time of day. Timezones were all converted to U.S./New_York. "Late night" is defined as 12 AM-4:59 AM.¹¹² "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.¹¹³

Figure 14: Analysis of When Uber Sent Richardson Idle Ride Notifications (UBER-MDL3084-BW-00000011)



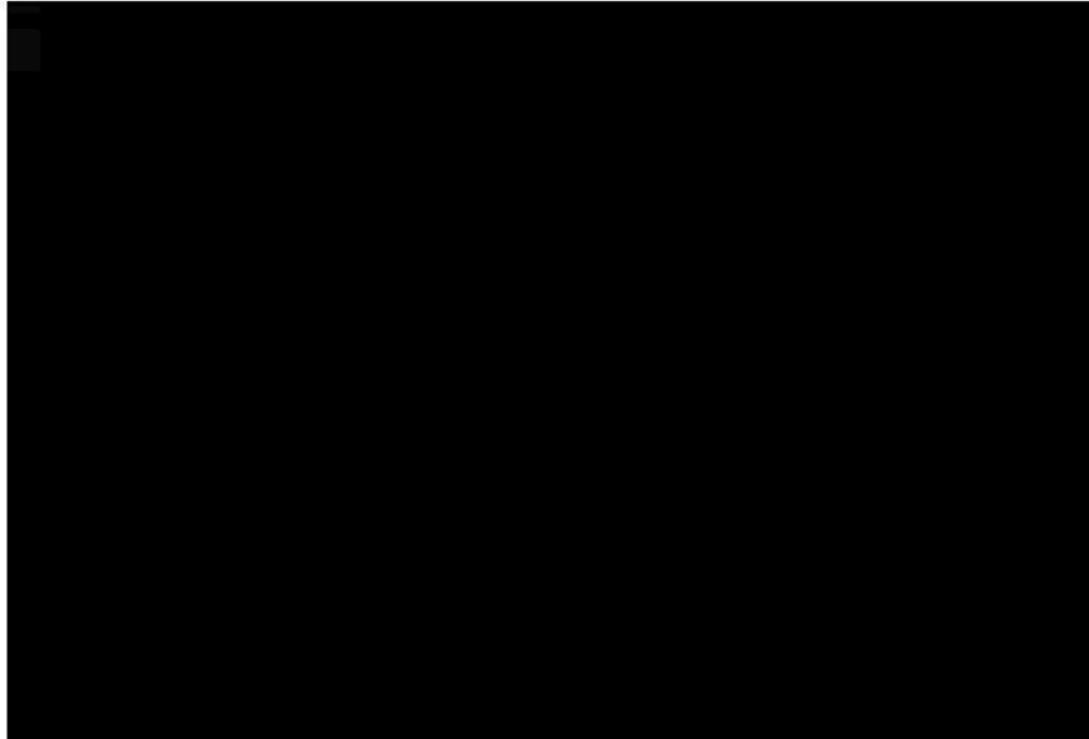
¹¹² "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹¹³ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

D. Sexual Assault and Sexual Misconduct Incident History

26. The following figure shows Uber's internal Incident History for Richardson.

Figure 15: Uber Kept Track of Richardson's Safety Incident History, Including Sexual Assault and Sexual Misconduct Incidents (UBER-MDL3084-DFS00159617)



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UBER-MDL3084-DFS00159617

V. Profile: Felix Perez Rodriguez

27. Felix Perez Rodriguez was the driver of Plaintiff [REDACTED] trip on June 28, 2024. Rodriguez's Uber Investigations Workbench showed that he had a lifetime total of 26,149 trips. Of the trips Uber produced, a number were missing a local timestamp.¹¹⁴ Therefore, I was able to analyze 23,305 trips¹¹⁵ with Rodriguez as the Driver. Uber tracked when Rodriguez was reported for Safety Incidents, including SA/SM Incidents. Rodriguez had twenty-three reported Safety Incidents, including two SA/SM Incidents: June 26, 2022 (Sexual Assault Non-Consensual Touching - Non-Sexual Body Part) and June 28, 2024 (Sexual Assault Non-Consensual Touching - Sexual Body Part). The supporting Safety Data and related case materials I considered for these SA/SM Incidents are included in the attached Appendices D1 and D2.

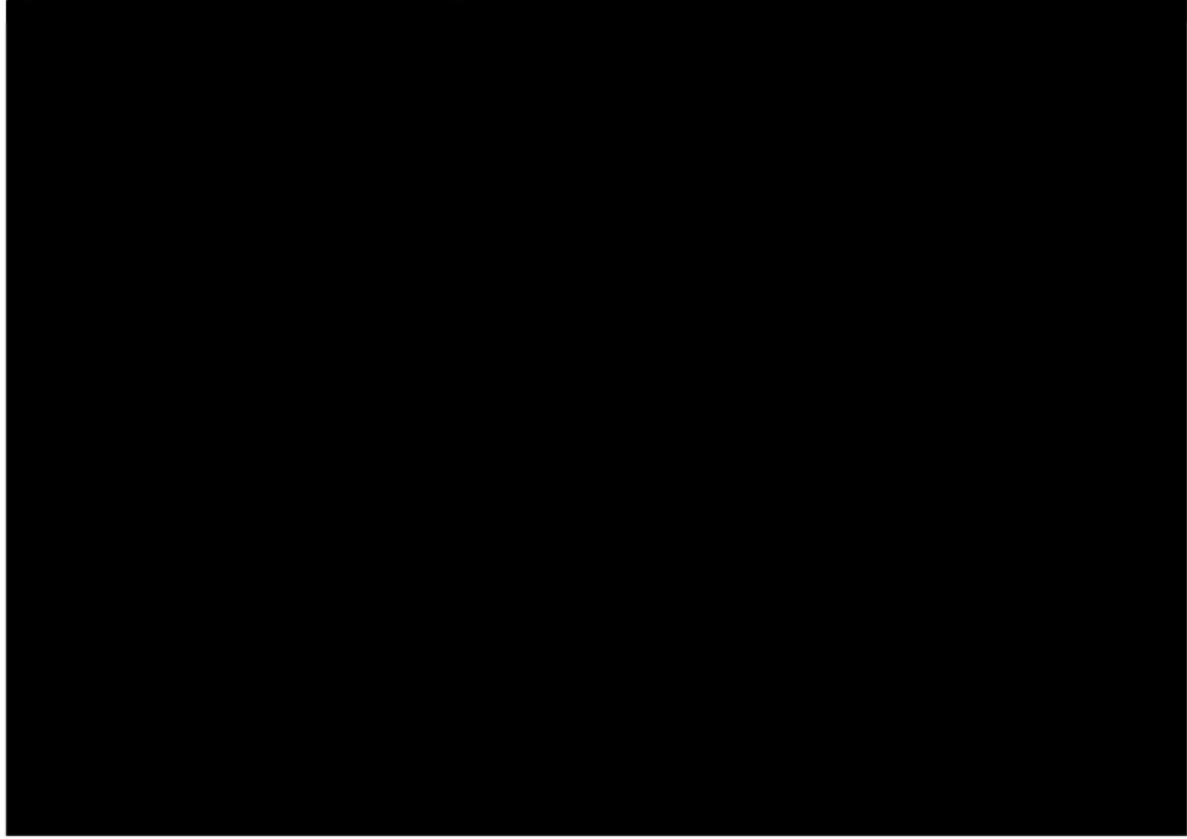
¹¹⁴ 'Begin Trip At Local' field.

¹¹⁵ I analyzed all trip data produced by Uber for the Bellwether Drivers, without limiting the data to dates prior to the Plaintiff's reported incident.

A. Driver Trip Profile

28. The following figure shows Rodriguez's profile on Uber's internal Investigations Workbench.

**Figure 16: Uber's Investigations Workbench Provides an Overview of Rodriguez's Activity, Including Whether He Has Been Banned or Rejected as Rider or Driver
(UBER-MDL3084-BW-00006422)**

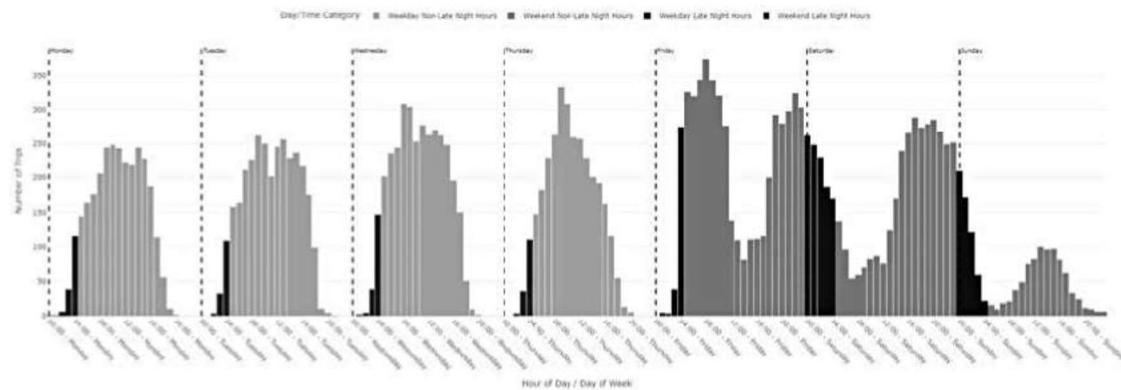


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UBER-MDL3084-BW-00006422

29. The following figure illustrates the total trips driven by day of the week and time of day. This data only considers trips where Begin Trip At Local is known and Status is "completed". The day of the week is determined by the Begin Trip At Local timestamp. "Late night" is defined as 12 AM-4:59 AM.¹¹⁶ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.¹¹⁷

Figure 17: Rodriguez's Trips During Late-Night or Non-Late-Night Hours on Weekends and Weekdays (UBER-MDL3084-BW-00006257)

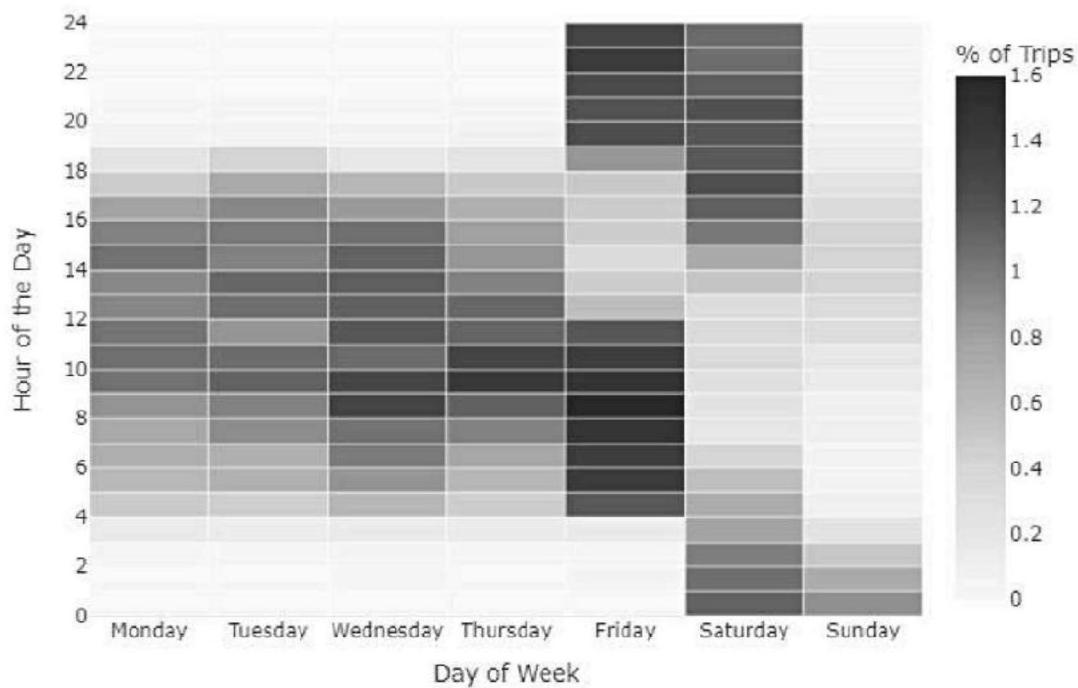


¹¹⁶ "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹¹⁷ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

30. The following figure displays a visualization known as a “heat map” of the trip volume. This data only considers trips where “Begin Trip At Local” is known and the “Status” field is shown as “completed.”

**Figure 18: Percent of Rodriguez's Trips by Hour
(UBER-MDL3084-BW-00006257)**



B. Driver Ratings

31. This table shows the number of completed trips for driver Rodriguez with a 1, 2, 3, 4, and 5 star rating and the percent of each rating by time of day. Only trips with a known begin date and a submitted rating were considered. “Late night” is defined as 12 AM-4:59 AM.¹¹⁸ “Weekend” is defined as Friday at 12:00 am to Sunday at 11:59pm.¹¹⁹

**Table 5: Rodriguez’s Ratings (1 to 5 Stars) and When They Occurred
(UBER-MDL3084-BW-00006257)**

| Driver Rating | % Of Trips On Weekday Non-Late Night Hours | % Of Trips On Weekday Late Night Hours | % Of Trips On Weekend Non-Late Night Hours | % Of Trips On Weekend Late Night Hours | Total Rated Trips |
|---------------|--|--|--|--|-------------------|
| 1 | 50 | 3.75 | 40 | 6.25 | 160 |
| 2 | 45 | 1.67 | 50 | 3.33 | 60 |
| 3 | 54.41 | 2.94 | 41.18 | 1.47 | 136 |
| 4 | 60.44 | 1.58 | 34.81 | 3.16 | 316 |
| 5 | 50.54 | 2.75 | 38.25 | 8.46 | 11,247 |

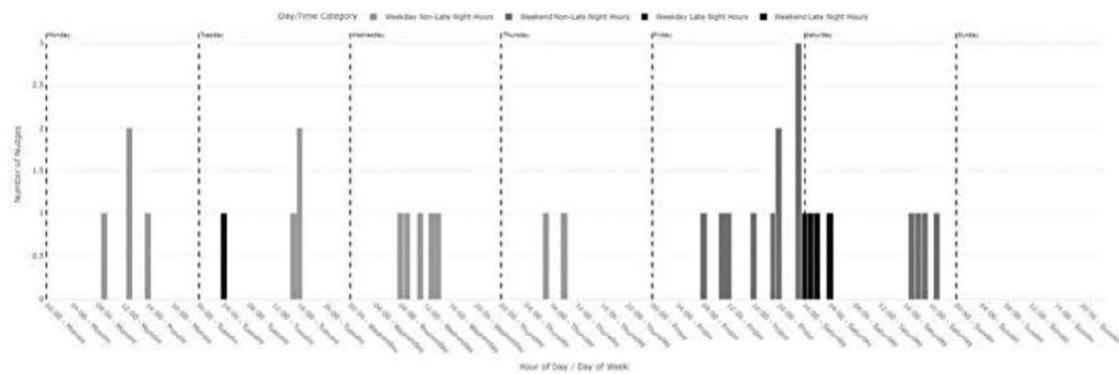
¹¹⁸ “Late night” is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹¹⁹ “Weekend” is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

C. Idle Ride Notifications

32. In the following figure, I show the volume of was directed by counsel to consider Idle Ride Notifications by time of day. Timezones were all converted to U.S./Phoenix. “Late night” is defined as 12 AM-4:59 AM.¹²⁰ “Weekend” is defined as Friday at 12:00 am to Sunday at 11:59pm.¹²¹

Figure 19: Analysis of When Uber Sent Rodriguez Idle Ride Notifications (UBER-MDL3084-BW-00000029)



¹²⁰ “Late night” is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹²¹ “Weekend” is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

D. Sexual Assault and Sexual Misconduct Incident History

33. The figure below shows Uber's internal Incident History for Rodriguez.

**Figure 20: Uber Kept Track of Rodriguez's Safety Incident History, Including Sexual Assault and Sexual Misconduct Incidents
(UBER-MDL3084-DFS00159622)**



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UBER-MDL3084-DFS00159622

VI. Profile: Michael Le

34. Michael Le was the driver of Plaintiff [REDACTED] trip on August 10, 2023. Le's Uber Investigations Workbench showed that he had a lifetime total of 11,413 trips. Of the trips Uber produced, a number were missing a local timestamp.¹²² Therefore, I was able to analyze 4,175 trips¹²³ with Le as the Driver. Uber tracked when Le was reported for Safety Incidents, including SA/SM Incidents. Le had eight reported Safety Incidents, including two SA/SM Incidents: June 18, 2023 (Sexual Misconduct - Insufficient Information) and August 10, 2023 (Sexual Assault - Non-Consensual Kissing, Sexual Body Part). Le continued to operate on Uber's platform until January 1, 2025, when he was deactivated.¹²⁴ The supporting Safety Data and related case materials I considered for these SA/SM Incidents are included in the attached Appendices D1 and D2.

¹²² 'Begin Trip At Local' field.

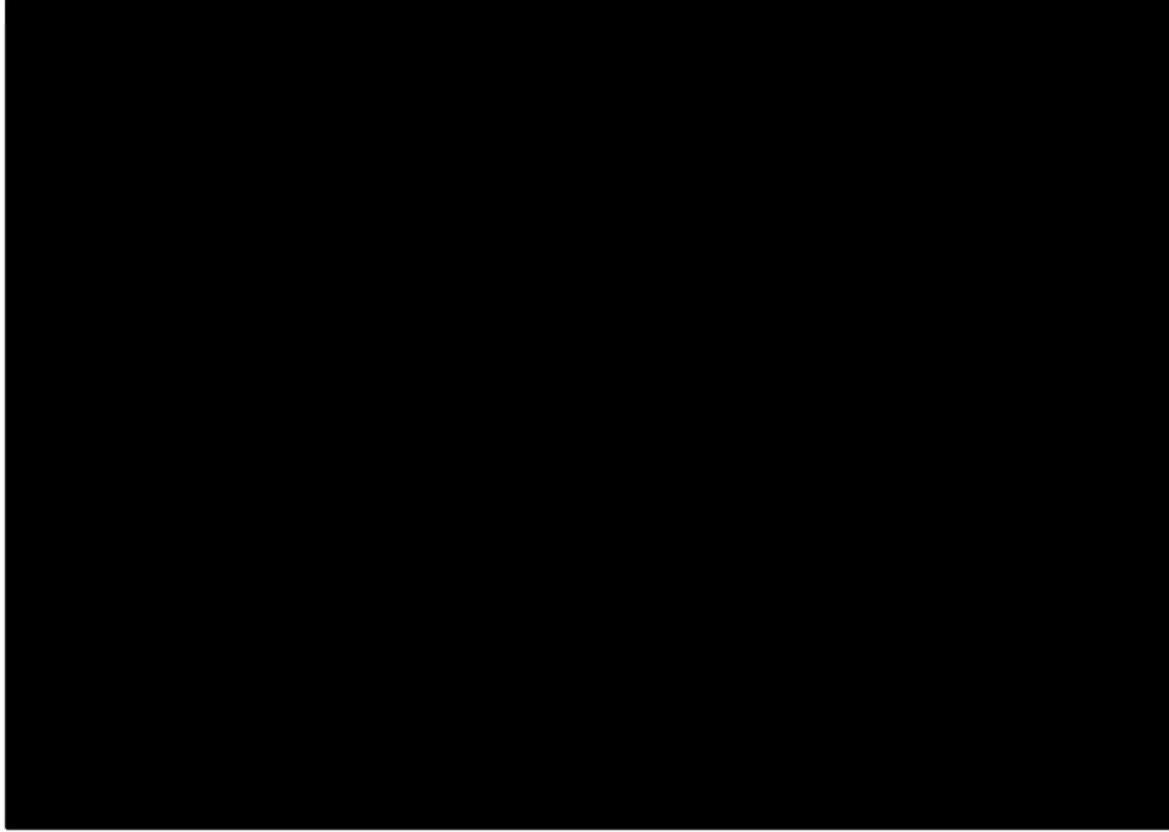
¹²³ I analyzed all trip data produced by Uber for the Bellwether Drivers, without limiting the data to dates prior to the Plaintiff's reported incident.

¹²⁴ Deposition of Hannah Nilles, 08/07/2025, Exhibit 1373.

A. Driver Trip Profile

35. The following figure shows Le's profile on Uber's internal Investigations Workbench.

**Figure 21: Uber's Investigations Workbench Provides an Overview of Le's Activity, Including Whether He Has Been Banned or Rejected as Rider or Driver
(UBER-MDL3084-BW-00006398)**

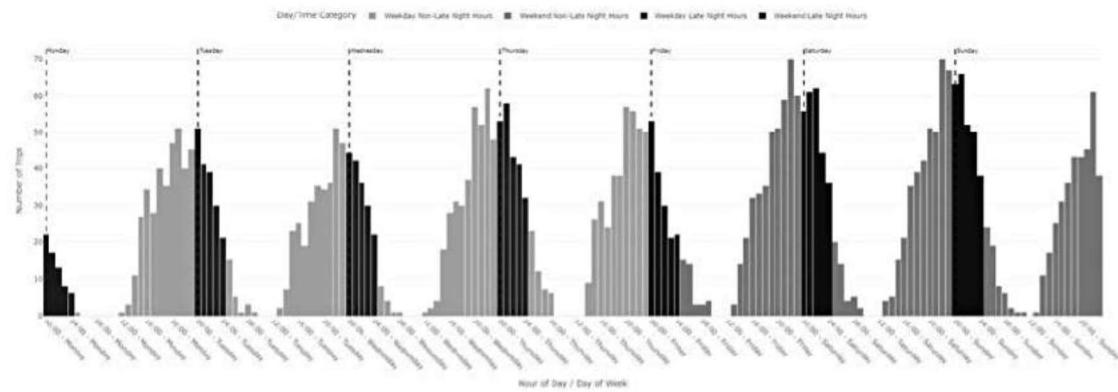


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UBER-MDL3084-BW-00006398

36. The following figure illustrates the total trips driven by day of the week and time of day. This data only considers trips where Begin Trip At Local is known and Status is "completed". The day of the week is determined by the Begin Trip At Local timestamp. "Late night" is defined as 12 AM-4:59 AM.¹²⁵ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.¹²⁶

**Figure 22: Le's Trips During Late-Night or Non-Late-Night Hours on Weekends and Weekdays
(UBER-MDL3084-BW-00006265)**

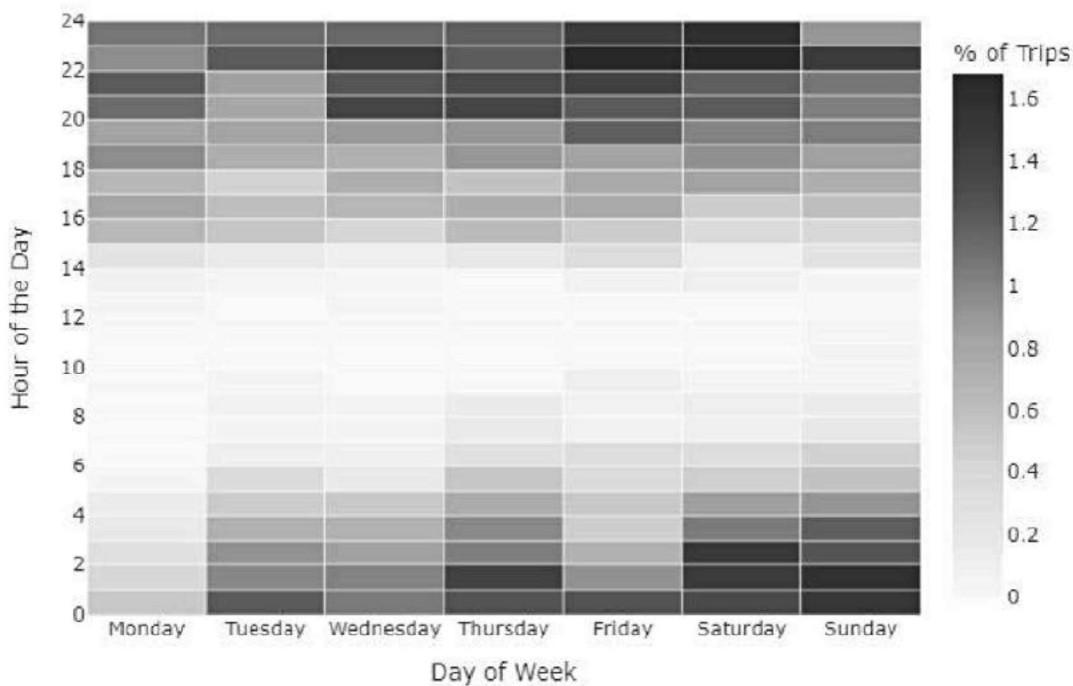


¹²⁵ "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹²⁶ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

37. The following figure displays a visualization known as a “heat map” of the trip volume. This data only considers trips where “Begin Trip At Local” is known and the “Status” field is shown as “completed.”

**Figure 23: Percent of Le's Trips by Hour
(UBER-MDL3084-BW-00006265)**



B. Driver Ratings

38. The following table shows the number of completed trips for driver Le with a 1, 2, 3, 4, and 5 star rating and the percent of each rating by time of day. Only trips with a known begin date and a submitted rating were considered. "Late night" is defined as 12 AM-4:59 AM.¹²⁷ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.¹²⁸

**Table 6: Le's Ratings (1 to 5 Stars) and When They Occurred
(UBER-MDL3084-BW-00006265)**

| Driver Rating | % Of Trips On Weekday Non-Late Night Hours | % Of Trips On Weekday Late Night Hours | % Of Trips On Weekend Non-Late Night Hours | % Of Trips On Weekend Late Night Hours | Total Rated Trips |
|---------------|--|--|--|--|-------------------|
| 1 | 41.67 | 8.33 | 41.67 | 8.33 | 12 |
| 2 | 0 | 0 | 50 | 50 | 2 |
| 3 | 40 | 30 | 30 | 0 | 10 |
| 4 | 40 | 6.67 | 40 | 13.33 | 15 |
| 5 | 36.38 | 14.95 | 32.62 | 16.05 | 2,100 |

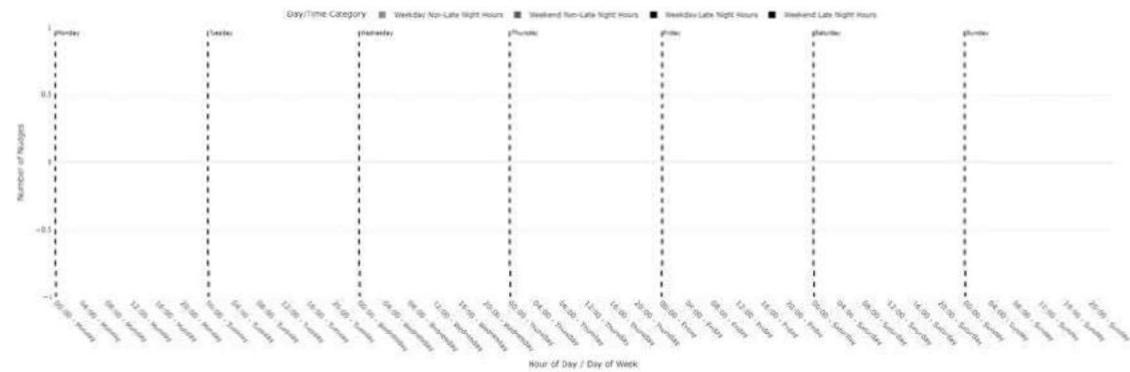
¹²⁷ "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹²⁸ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

C. Idle Ride Notifications

39. In the following figure, I show the volume of was directed by counsel to consider Idle Ride Notifications by time of day. Timezones were all converted to U.S./Los_Angeles. "Late night" is defined as 12 AM-4:59 AM.¹²⁹ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm.¹³⁰

**Figure 24: Analysis of When Uber Sent Le Idle Ride Notifications
(UBER-MDL3084-BW-00000032)**



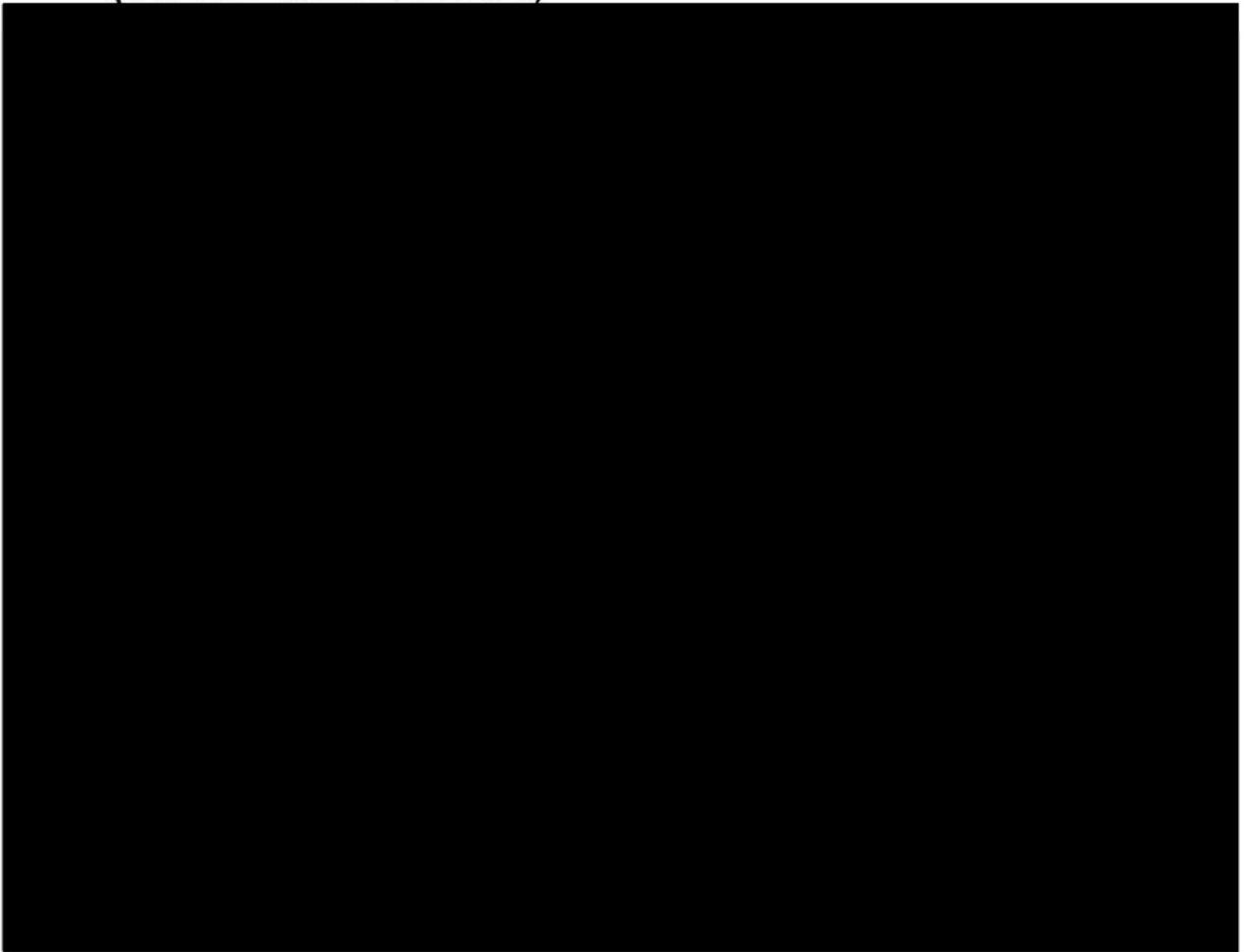
¹²⁹ "Late night" is defined as 12 AM-4:59 AM (Deposition of Sunny Wong, 07/23/2025, 30:12-15).

¹³⁰ "Weekend" is defined as Friday at 12:00 am to Sunday at 11:59pm (Deposition of Sunny Wong, 07/23/2025, 29:10-22).

D. Sexual Assault and Sexual Misconduct Incident History

40. The following figure shows Uber's internal Incident History for Le.

**Figure 25: Uber Kept Track of Le's Safety Incident History, Including Sexual Assault and Sexual Misconduct Incidents
(UBER-MDL3084-DFS00159626)**



**IN THE UNITED STATES COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

| | |
|--|-------------------------------|
| In re: Uber Technologies, INC., Passenger Sexual Assault Litigation | Case No. 3:23-md-03084-CRB |
|--|-------------------------------|

**Updated Expert Report of Lacey R. Keller (“Updated Keller Report”)
Appendix G - Materials Considered**

Dated: December 2, 2025

Confidential and Subject to Protective Order

Appendix G
Documents and Materials Considered

All Citations and References in the Expert Report

Academic Articles and Books

Sharda, R., Delen, D., & Turban, E. (2017). Business intelligence, analytics, and data science: A managerial perspective (4th ed.). Pearson.

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Basu, S., Fernald, J. G., & Shapiro, M. D. (2001). Productivity growth in the 1990s: technology, utilization or adjustment? Carnegie-Rochester Conference Series on Public Policy, 55(1)
<https://doi.org/https://www.sciencedirect.com/science/article/abs/pii/S0167223101000549>

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https://www.researchgate.net/profile/Saman-Siadati/publication/395109847_Data_Science_Foundations/links/68b3afc2360112563e0f7e60/Data-Science-Foundations.pdf

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Uber Website and Documents

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"Under the Hood of Uber's Experimentation Platform" Uber Blog. [Under the Hood of Uber's Experimentation Platform Uber Blog.pdf](#)

Uber Technologies, Inc. 2021 Form 10-K Annual Report. [Ex. A - 2021 10-K.pdf](#)

Uber Technologies, Inc. 2019 Form 10-K Annual Report. [Ex. B - 2019 10-K.pdf](#)

Uber Technologies, Inc. 2022 Form 10-K Annual Report. [Ex. C - 2022 10-K.pdf](#)

Uber Technologies, Inc. 2023 Form 10-K Annual Report. [Ex. D - 2023 10-K.pdf](#)

Uber Technologies, Inc. 2024 Form 10-K Annual Report. [Ex. E - 2024 10-K.pdf](#)

Uber S-1 Response. [Ex. L - S-1 Response.pdf](#)

Uber 2020 Proxy Statement. [Ex. M - 2020 Proxy Statement.pdf](#)

Uber 2021 Proxy Statement. [Ex. N - 2021 Proxy Statement.pdf](#)

Uber 2022 Proxy Statement. [Ex. O - 2022 Proxy Statement.pdf](#)

Uber 2023 Proxy Statement. [Ex. P - 2023 Proxy Statement.pdf](#)

Uber 2024 Proxy Statement. [Ex. Q - 2024 Proxy Statement.pdf](#)

Uber 2025 Proxy Statement. Ex. K - 2025 Proxy Statement.pdf

Pleadings

Declaration of Todd Gaddis (June 10, 2025)

In Re: Uber Technologies, Inc., Passenger Sexual Assault Litigation, Case No. 23-md-03084-CRB. July 9, 2024 Order Granting in Part and Denying in Part Joint Discovery Letter Brief Regarding Discovery Related to Safety Data and Statistics.

Declaration of Todd Gaddis (August 18, 2025)

The setup of the AWS system as agreed by the Parties is described in Appendix A to Confidentiality Agreement between BDO USA and Plaintiffs' Steering Committee

Master Long Form Complaint, filed at ECF 269 in *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*.

Plaintiff First Amended Bellwether Complaint and Demand for Jury Trial, filed at ECF 2506 in *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, No. 3:23-cv-06708 (N.D. Cal.).

Plaintiff's First Amended Short Form Complaint and Demand for Jury Trial, directly filed on March 14, 2025 at ECF 2509 as a member case (No. 3:24-cv-7019) in MDL 3084, *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation* (N.D. Cal.).

Plaintiff Short Form Complaint and Demand for Jury Trial, directly filed on November 8, 2025 as a member case (No. 3:24-cv-07821) in MDL 3084, *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation* (N.D. Cal.).

Plaintiff First Amended Bellwether Complaint and Demand for Jury Trial, filed at ECF 2513 in *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, No. 3:24-cv-4900 (N.D. Cal.).

Plaintiff Initial Complaint. On August 9, 2024, Plaintiff B.L. filed her Complaint against Uber in the Superior Court of the State of California, County of San Francisco. Case No. CGC-24-617115. The case was later transferred and coordinated into the JCCP Case. 5188 by Order of the Court on October 14, 2024.

Plaintiff Short-Form Complaint. On November 11, 2024, Plaintiff B.L. filed her Short-Form Complaint against Uber at ECF 1 in *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, No. 3:24-cv-7940.

Plaintiff First Amended Bellwether Complaint and Demand for Jury Trial, filed at ECF 2092 in *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, No. 3:24-cv-7940 (N.D. Cal.).

Plaintiff Second Amended Bellwether Complaint and Demand for Jury Trial, filed at ECF 3925 in *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, No. 3:24-cv-7940 (N.D. Cal.).

MDL and JCCP Depositions with Exhibits

Michael Akamine Deposition and Exhibits (5/19/25 and 5/20/25)
 Brooke Anderson Deposition and Exhibits (05/01/25 and 05/02/25 and 5/6/25)
 William Anderson Deposition and Exhibits (9/26/23)
 Matthew Baker Deposition and Exhibits (11/13/24)
 PMK (Emilie Boman) Deposition and Exhibits (3/5/25 and 4/1/25)
 Tracy Breeden Deposition and Exhibits (3/13/25 and 3/14/25)
 30(b)(6) (Gregory Brown) Deposition and Exhibits (6/17/25)
 30(b)(6) (Gregory Brown) Deposition and Exhibits (July 15-16, 2025 and August 25-26, 2025)
 PMK (Gregory Brown) Deposition and Exhibits (3/13/25 and 3/14/25 and 5/7/25)
 30(b)(6) (Jamie Brown) Deposition and Exhibits (August 6, 2025)
 Jordan Burke Deposition and Exhibits (3/20/25 and 3/21/25)
 Faiz Bushra Deposition and Exhibits (5/13/25)
 Philip Cardenas Deposition and Exhibits (2/26/25)
 Frank Chang Deposition and Exhibits (5/9/25)
 30(b)(6) (Heather Childs) Deposition and Exhibits (6/5/25)
 Dennis Cinelli Deposition and Exhibits (3/28/25)
 30(b)(6) (Chad Dobbs) Deposition and Exhibits (8/21/25)
 30(b)(6) (Mariana Esteves) Deposition and Exhibits (7/15/25 and 8/28/25)
 Chadd Fogg Deposition and Exhibits (2/5/25)
 Cory Freivogel Deposition and Exhibits (12/10/24 and 2/6/25)
 Henry (Gus) Fuldner Deposition and Exhibits (3/26/25 and 3/27/25 and 4/29/25)
 30(b)(6) (Todd Gaddis) Deposition and Exhibits (7/11/25)
 PMK (Todd Gaddis) Deposition and Exhibits (7/8/25 and 7/9/25 and 7/11/25)
 Catherine Gibbons Deposition and Exhibits (6/5/25)
 Ryan Graves Deposition and Exhibits (5/13/25)
 Andrew Hasbun Deposition and Exhibits (4/10/25 and 4/11/25)
 Cassandra Hawk Deposition and Exhibits (4/8/25)
 Jill Hazelbaker Deposition and Exhibits (6/17/25)
 Rachel Holt Deposition and Exhibits (12/12/24 and 4/9/25)
 Jordan Hornback Deposition and Exhibits (3/31/25)
 Nairi Hourdajian Deposition and Exhibits (2/7/25)
 Meghan Joyce Deposition and Exhibits (2/26/25)
 Roger Kaiser Deposition and Exhibits (11/19/24 and 4/22/25)
 Travis Kalanick Deposition and Exhibits (7/3/25)
 Sachin Kansal Deposition and Exhibits (5/28/25)
 Dara Khosrowshahi Deposition and Exhibits (7/1/25)
 Carly Lake Deposition and Exhibits (3/20/25 and 3/21/25)
 Jenny Luu Deposition and Exhibits (2/27/25)
 30(b)(6) (Katherine McDonald) Deposition and Exhibits (4/25/25)
 Katherine McDonald Deposition and Exhibits (10/7/24 and 5/7/25)

30(b)(6) (Hannah Nilles) Deposition and Exhibits (6/30/25)
 30(b)(6) (Hannah Nilles) Deposition and Exhibits (7/10/25)
 30(b)(6) (Hannah Nilles) Deposition and Exhibits (7/23/25 and 8/7/25)
 PMK (Hannah Nilles) Deposition and Exhibits (5/5/25 and 5/14/25 and 5/29/25)
 30(b)(6) (Hannah Nilles) Deposition and Exhibits (August 7, 2025)
 Jodi Page Deposition and Exhibits (5/21/25)
 Katherine Parker Deposition and Exhibits (12/3/24 and 2/14/25)
 PMK (Rebecca Payne) Deposition and Exhibits (4/2/25 and 4/3/25 and 5/2/25 and 5/12/25 and 5/13/25)
 Andi Pimentel Deposition and Exhibits (10/15/24 and 3/27/25)
 Cameron Poetzscher Deposition and Exhibits (6/4/25)
 David Richter Deposition and Exhibits (2/24/25)
 Brad Rosenthal Deposition and Exhibits (10/24/23)
 30(b)(6) (Elizabeth Ross) Deposition and Exhibits (6/11/25 and 6/12/25)
 Danielle Sheridan Deposition and Exhibits (5/15/25 and 5/16/25)
 Valerie Shuping Deposition and Exhibits (4/17/25 and 4/18/25)
 Nicholas Silver Deposition and Exhibits (11/21/24)
 Troy Stevenson Deposition and Exhibits (10/21/24)
 Joseph Sullivan Deposition and Exhibits (6/25/25)
 Michael Sullivan Deposition and Exhibits (3/26/25)
 Pat Twomey Deposition and Exhibits (5/29/25)
 Kayla Whaling Deposition and Exhibits (2/28/25 and 4/22/25)
 30(b)(6) (Sunny Wong) Deposition and Exhibits (6/25/25)
 PMK (Sunny Wong) Deposition and Exhibits (4/16/25)
 30(b)(6) (Sunny Wong) Deposition and Exhibits (7/23/25)
 30(b)(6) (Sunny Wong) Deposition, Aids, and Exhibits (10/14/2025)
 30(b)(6) (Todd Gaddis) Deposition, Aids, and Exhibits (11/7/2025)
 Defendants' Uber Technologies, Inc., Rasier LLC, and Rasier-CA, LLC's Responses to Topics 3-15 of All Plaintiffs' Notice of 30(b)(6) Deposition of Uber Technologies, Inc., Rasier LLC, and Rasier-CA, LLC (Recordkeeping) with Exhibits (7/2/25)
 Flack Data Produced via BDO dated October 13 and 17, 2025

Documents Produced

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| UBER-MDL3084-DFS00216662 | UBER-MDL3084-DFS00216724 |
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| UBER-MDL3084-DFS00216678 | WK_000001 |
| UBER-MDL3084-DFS00216681 | |

[SAFE-3547518] 29-Jan-2023 – Minneapolis – St. Paul / 28 / United States / Midwest / US Central & Canada / US & Canada – LF – Non-Consensual Kissing – Seuxal Body Part (January 29, 2023)
 20-Dec-2019 - San Francisco / 1 / United States / West / US West / US & Canada - L3 -
 Non-Consensual Touching - Non-Sexual Body Part

Accessing S3 Buckets User Guide (November 22, 2024)

April 30, 2025 UUID production

August 6, 2025 New York Times article

BDO Document (Combined)

Buzzfeed, (Mar. 6, 2016 (Hourdajian Ex. 104)

BW-DEAN_JAYLYNN_000083 - 000085

Chronology of Incident Reports

City ID Codes – Highly Confidential – Attorney's Eyes Only

City_ID Codes - Highly Confidential Attorneys' Eyes Only

Email from Jay Haider (February 1, 2025)

How Data Shapes the Uber Rider App

How Uber Achieves Operational Excellence in the Data Quality Experience
Incident Report Field Convenience Descriptions (March 24, 2025)
Internal Data Offers Glimpse At Uber Sex Assault Complaints
July 3, 2025 Deposition of Travis Kalanick
Mar. 24, 2025 Field Convenience Description List
March 24, 2025 email from J. Haider re: Outstanding safety data issues.
New York City / 5 / United States / TRIPAD / US East / US & Canada - L2 - Verbal - Non-explicit
Inappropriate Remark / Gesture
NSVRC_00052
NSVRC_85701
Parent Category Usage Tracking
PETERS SUBPOENA-00013327
PETERS SUBPOENA-00014227
PETERS SUBPOENA-00016157
PETERS SUBPOENA-00022460
PETERS SUBPOENA-00022958
PETERS SUBPOENA-00022966
PETERS SUBPOENA-00023127
PETERS SUBPOENA-00023552
PETERS SUBPOENA-00025807
PETERS SUBPOENA-00033369
PETERS SUBPOENA-00039349
PETERS SUBPOENA-00047636
PETERS SUBPOENA-00047651
PETERS SUBPOENA-00048918
QS_00000701
Safe Dispatch Model (SDM)
Tab 8, SRAD Features – 2022 – H2
The Flack Incident Classification Data, 2017-2024
The History of Uber
U.S. Safety Report 2020-2021
Uber Custodial/Non-Custodial.xlsx (March 28, 2024)

Other

Final Clawback Agreement (June 1, 2025)
Hassan Ibrahim Turay Bosco Comprehensive Report (February 17, 2025)
United States Government Accountability Office Report to Congressional Address – Ridesharing and Taxi Safety: Information on Assaults Against Drivers and Passengers (February 2024)
BDO_MDL - Uber Data Walkthrough-20241205_140422-Meeting Recording

Discovery

Defendants Uber Technologies, Inc., Rasier LLC and Rasier-CA, LLC's Amended Responses to Plaintiffs' Second Set of Interrogatories, (May 1st, 2025)
Uber's Second Amended Responses to Plaintiffs' Second Set of Interrogatories, (May 28, 2025)
Defendants Responses and Objections to Plaintiff's First Set of Interrogatories (June 20, 2024)

Information Provided by Defendants Pursuant to the Parties Agreement, Dated April 4, 2025
BW Defendant Fact Sheet Excerpts

Defendants Amended Responses to Plaintiffs' Second Set of Interrogatories (May 1, 2025)

Defendants Responses to Plaintiffs' Second Set of Interrogatories (April 30, 2025)

Peter Sauerwein Verification re Responses to Plaintiff's Second Set of Interrogatories (May 2, 2025)

Defendants Responses to Interrogatory No. 28 of Plaintiffs' Second Set of Interrogatories.

Defendants Response to Interrogatory No. 4

Defendants Response to Interrogatory No. 5

Defendants August 18, 2025 Objections and Responses to Plaintiffs' Interrogatories and Requests for Admissions in Lieu of 30(b)96 Depositions

Supplemental Declaration of Todd Gaddis (June 10, 2025)

Declaration of Todd Gaddis (August 18, 2025)

Defendants Certification re Incident Report Data Pursuant to ECF 2407 (March 6, 2025)

Certification of Katherine McDonald (January 10, 2025)

Certification of Katherine McDonald (February 25, 2025)

In Re: Uber Technologies, Inc. Passenger Sexual Assault Litigation United States District Court, Northern District of California, Case No. 3:23-md-03084-CRB – BDO Appendix A

Deactivation Reason Data Re Interrogatory Nos 16 and 29

Trip Payment Information Provided by Defendants Pursuant to the Parties' Agreement Dated April 10, 2025